



April 6, 2022

VIA ECF

Hon. Katherine Polk Failla
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

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Re: *Three Brothers Trading, LLC v. Generex Biotechnology Corp.*
Case No. 18-cv-11585 (KPF)

Dear Judge Failla:

We write on behalf of Oasis Capital, LLC (“Oasis”) in furtherance of the Court’s order [ECF No. 151] to appear for a telephonic conference regarding Oasis’ motion to intervene and Petitioner’s Proposed Receiver Order.¹

Attached as Exhibit A to this letter is a counter proposed Order (the “Oasis Counter Proposed Order”) which removes the objectionable and pseudo-bankruptcy provisions. We have attached as Exhibit B a redline between the Oasis Counter Proposed Order and the Proposed Receiver Order. Contrary to AEXG’s assertions, Oasis is not attempting to delay this proceeding. Rather, Oasis objects to those provisions of the Proposed Receiver Order that circumvent the Bankruptcy Code and create new rights for the Participating Creditors at the direct expense of the property rights of Oasis. Despite that narrow objective and invitations to confer or mediate, counsel for the Participating Creditors have never contacted undersigned counsel to speak.

The Oasis Counter Proposed Order accomplishes the goal of appointing a receiver without the objectionable and extraordinary provisions. Importantly, the Oasis Counter Proposed Order does not prohibit the receiver from taking any lawful act, or seeking additional relief from this Court. We look forward to addressing any questions the Court may have at today’s conference.

¹ Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in Oasis’ prior letters [ECF Nos. 143, 145 and 150].



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Respectfully submitted,

ArentFox Schiff LLP

/s/ George Angelich

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